

JAP:AHT

**M-10-423**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

PATIENCE IBEKWE,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

CARLOS SOTO, being duly sworn, deposes and states that he is a Special Agent with Immigration and Customs Enforcement ("ICE"), duly appointed according to law and acting as such.

Upon information and belief, on or about April 15, 2010, within the Eastern District of New York and elsewhere, defendant PATIENCE IBEKWE did knowingly, intentionally and unlawfully import into the United States from a place outside thereof heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

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<sup>1/</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. At approximately 12:30 a.m. on April 15, 2010, defendant PATIENCE IBEKWE arrived at John F. Kennedy International Airport in Queens, New York, aboard Air Maroc Flight No. 200 from Benin.

2. During an examination, the defendant told a Customs and Border Protection Inspector that she was coming to the United States to see a fertility doctor in Houston, Texas. The defendant presented an invitation letter that purported to be from the fertility doctor, but the letter appeared to be counterfeit to the CBP Inspector. The defendant also did not have tickets to Houston. The defendant claimed that she was going to stay with her uncle in the Bronx, but a search of the defendant's belonging revealed hotel reservations in the New York area for the same night that she claimed she was going to be staying with her uncle. The defendant's travel history revealed that she had made multiple trips to the United States in a short period of time and that a third-party had purchased the defendant's seat on Flight No. 200 with cash one day before the trip.


3. The defendant was confronted with the above-mentioned information. The defendant then admitted that she had ingested 83 pellets of narcotics.

4. On April 15, 2010, the defendant was transported to the JFK Medical Facility, where the defendant passed 23

pellets, one of which field-tested positive for the presence of heroin. The defendant was then placed under arrest.

5. Defendant will be detained at the JFK Medical Facility until such time as she has passed all the pellets contained within her intestinal tract.

WHEREFORE, your deponent respectfully requests that defendant PATIENCE IBEKWE be dealt with according to law.

  
CARLOS SOTO  
Special Agent  
Immigration and Customs  
Enforcement

Sworn to before me this  
16th day of April, 2010

  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK